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ORIGINAL

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

FILED  
U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FT. WORTH DIVISION  
2015 MAR 24 PM 3:30  
*[Signature]*

HENRY LEE SIMS, JR., et al

CLERK OF COURT

*Plaintiffs,*

VS.

CASE NO. 4:14-cv-00045-A

KIA MOTORS AMERICA, INC. and  
KIA MOTORS CORPORATION,

*Defendants.*

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APPENDIX IN SUPPORT OF DEFENDANTS' BRIEF IN  
SUPPORT OF DEFENDANTS' MOTION TO COMPEL  
PLAINTIFFS' PRIMARY LIABILITY EXPERT'S DEPOSITION BY  
APRIL 15, 2015, AND REQUEST FOR EXPEDITED BRIEFING SCHEDULE

TO THE HONORABLE COURT:

Defendants Kia Motors America, Inc. and Kia Motors Corporation respectfully submit this Appendix corresponding with Defendants' Brief In Support Of Defendants' Motion to Compel Plaintiffs' Primary Liability Expert's Deposition by April 15, 2015, and Request for Expedited Briefing Schedule. The Appendix contains the following materials:

EXHIBIT	DESCRIPTION	PAGE NUMBERS
Exhibit A	Expert Testimony of Jerry G. Wallingford	3 – 6

Respectfully submitted,



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COUNSEL FOR KIA MOTORS AMERICA,  
INC. AND KIA MOTORS CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record in this cause in accordance with the Federal Rules of Civil Procedure on this 24th day of March, 2015.



**Expert Testimony  
of  
Jerry G. Wallingford**

Date	Project Number	Client	Case Style	Case Venue	Cause Number	Type
December 19, 2014	11-135-FP	Kuhlman, Brad	Dominquez vs. General Motors LLC	192nd Judicial District, District Court of Dallas County, Texas	DC-11-09945	Depo
December 2, 2014	13-146-FP	Wilson, Frank	Ryan T. McCormick vs. Brandon Ray Sellers et al	Circuit Court For Butler County, Alabama	2013-900118	Depo
October 3, 2014	12-102-FP	Baker, Benjamin	Hurst, et al vs Mazda Motor Corporation et al	Circuit Court of Jefferson County, Alabama, Bessemer Division	2012-900498	Trial
September 11, 2014	12-143-RP	Gentile, Doug	Danielle C. Meads, vs. Harmony Juvenile Products and Wal-Mart Stores East et al	Circuit Court of the 15th Judicial Circuit in and for Palm Beach County, Florida	50-2011-CA-008858-XXXXMB	Depo
August 13, 2014	12-173-RP	Levinthal, Jared	Sharon Brunston, vs. Cowboy Motorsports of Beaumont, LP and Thunder Mountain Custom Cycles, Inc.	215th Judicial District, District Court of Harris County, Texas	2012-40248	Trial
May 2, 2014	12-102-FP	Baker, Benjamin	Hurst, et al vs Mazda Motor Corporation et al	Circuit Court of Jefferson County, Alabama, Bessemer Division	2012-900498	Depo
March 19, 2014	12-173-RP	Levinthal, Jared	Sharon Brunston, vs. Cowboy Motorsports of Beaumont, LP and Thunder Mountain Custom Cycles, Inc.	215th Judicial District, District Court of Harris County, Texas	2012-40248	Trial
February 28, 2014	13-129-HP	Jose, John	James Lane vs. Ledwell & Son Enterprises, Inc., and Holt Texas, LTD.	District Court of Jack County, Texas, 271st Judicial District	13-04-046	Depo
February 3, 2014	11-167-RP	Marks, Greg	Jose Ledesma vs. General Motors, Hyundai Motor et al	United States District Court for the Western District of Texas, San Antonio Division	5:12-cv-854	Depo
January 3, 2014	13-154-AP	Renard, Sandra	Ashley Nicole Thomas vs Sloan Petroleum Transport	Circuit Court for the County of Wayne, State of Michigan	11-07778-NI	Depo
November 21, 2013	07-135-FP	Russo, Sara	Bernice Jackson, et al vs. Ford Motor Company, et al	Circuit Court of Tunica County, Mississippi	01-0323	Depo
November 14, 2013	12-147-RP	Brogdon, Quentin	Robert and Hollie Powell vs. Ford Motor Company	U.S. District Court for the Western District of Texas Midland-Odessa Division	7:12CV114	Depo
October 18, 2013	10-122-FP	Kwass, David	Lugo v. American Honda Motor Co., Inc., et al	United States District Court for the District of New Jersey	1:12cv119	Depo
June 12, 2013	12-173-RP	Levinthal, Jared	Sharon Brunston, vs. Cowboy Motorsports of Beaumont, LP and Thunder Mountain Custom Cycles, Inc.	215th Judicial District, District Court of Harris County, Texas,	2012-40248	Depo

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June 4, 2013	12-167-FP	Thomas, Brady	Richard Lain and Deborah Lain, Plaintiffs, vs. Navistar, Inc. d/b/a International Trucks	District Court for the Southern District of Georgia, Waycross Division	5:12-cv-00068-LGW-JEG	Depo
May 1, 2013	12-1112-RP	Weiner, Michael	Connie J. Aasen, vs. Union Pacific Railroad Company, a Delaware Corporation, Defendant	District Court of Iowa In and for Pottawattamie County, Iowa	04781 LACV106067	Depo
April 9, 2013	10-106-FP	Stucky, Chris	Leifer vs. Navistar International Corp, et al	General Court of Justice, Superior Court Division, Lee County, North Carolina	11 CVS 753	Depo
Oct 31 & Nov 1, 2012	12-141-RP	Reed, Roger	Arevalo vs. Kawasaki Motors Corp, et al	149th Judicial District Court, Brazoria County, Texas	59283	Trial
September 18, 2012	12-141-RP	Reed, Roger	Arevalo vs. Kawasaki Motors Corp, et al	149th Judicial District Court, Brazoria County, Texas	59283	Depo
June 1, 2012	11-119-AP	Cain, James	Vernon Rusk vs. Yamaha Motor Corporation and Tiger Cycles, LLC	35th Judicial District Court Parish of Grant, State of Louisiana	20750	Depo
May 16, 2012	11-103-FP	Newell, Jeremy	Myong Re Kye vs. Daimler Trucks North American, et al	U.S. District Court for the Southern District of Texas, Houston Division	4:10-805	Trial
April 6, 2012	11-160-RP	Emison, Kent	Debra Davis vs. Schneider National Carriers, Inc., Schneider National, Inc., and Paul Turner	Circuit Court of Jefferson County, Arkansas	CV-2010-70-5	Depo
March 21, 2012	11-103-FP	Newell, Jeremy	Myong Re Kye vs. Daimler Trucks North American, et al	U.S. District Court for the Southern District of Texas, Houston Division	4:10-805	Depo
February 6 - 10, 2012	03-170-FP	Bethune, Scott	Michael J. Nolte and Barbie Nolte vs. Ford Motor Company	Circuit Court of Jackson County, Missouri at Kansas City	03CV-215677	Trial
January 26, 2012	11-160-RP	Emison, Kent	Debra Davis vs. Schneider National Carriers, Inc., Schneider National, Inc., and Paul Turner	Circuit Court of Jefferson County, Arkansas	CV-2010-70-5	Depo
Jan 11 & 12, 2012	11-130-CP	Crowley, Steve	Bonnie L. Johnson and Maynard Johnson vs. Fessler Carbonic Gas Company, Inc.	Iowa District Court for Polk County	109115	Trial
December 16, 2011	03-170-FP/OP	Bethune, Scott	Michael J. Nolte and Barbie Nolte vs. Ford Motor Company	Circuit Court of Jackson County, Missouri at Kansas City	03CV-215677	Hearin g
December 8, 2011	03-170-FP/OP	Bethune, Scott	Michael J. Nolte and Barbie Nolte vs. Ford Motor Company	Circuit Court of Jackson County, Missouri at Kansas City	03CV-215677	Depo
November 23, 2011	11-130-CP	Crowley, Steve	Bonnie L. Johnson and Maynard Johnson vs. Fessler Carbonic Gas Company, Inc.	Iowa District Court for Polk County	109115	Depo

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Date	Project Number	Client	Case Style	Case Venue	Cause Number	Type
September 30, 2011	10-103-FP	Moore, Chris	Barbara Morton vs. DodgeLand of Columbia, Inc. and Chrysler Group, LLC	State of South Carolina, Court of Common Pleas, Fifth Judicial Circuit, County of Richland	2010-CP-40-04784	Depo
September 27, 2011	10-133-FP	Hoey, Jim	Samora vs. Isuzu Commercial Truck of America, Inc., et al	Superior Court of the State of California for the County of Orange	30-2008 00113100	Depo
September 20, 2011	06-224-RP	Gentile, Doug	Michael Hamlett vs. Daimler Trucks North America, LLC; Sterling Truck Corp and Daimler AG	Circuit Court of the State of Oregon for the County of Multnomah Division	0908-11-1102	Trial
August 15, 2011	09-159-RP	Gentile, Doug	McCune et al v. Graco Children's Products, Inc. et al	U.S. District Court for the Eastern District of Texas, Texarkana Division	509-CV-107	Trial
July 8, 2011	09-134-FP	Thomas, Brady	Jeffrey Bush v. Kawasaki Motors Corp, USA, et al	State Court of Ware County, State of Georgia	S10Y036	Depo
May 24, 2011	11-121-RP	Hunnicutt, Richard	Brad Ettemann vs. Southwestern Motor Transport, Inc., et al	131st Judicial District Court of Bexar County, Texas	2008-CL-04553	Depo
February 11, 2011	09-159-RP	Gentile, Doug	McCune et al v. Graco Children's Products, Inc. et al	U.S. District Court for the Eastern District of Texas, Texarkana Division	5-2008CV00107	Depo
December 22, 2010	08-116-RP	Douthit, Evan	Gariby vs. Evenflo	Superior Court of the State of Arizona in and for the County of Pima	C20074296	Depo
November 2, 2010	08-187-TP	Langdon, Robert	Sowa et al vs. Kenny Construction et al	Circuit Court of Cook County, Illinois County Department - Law Division	2007 L 010232	Depo
September 16, 2010	10-112-FP	Emison, Kent	Miller/Crow/Rinaldi vs. Ford Motor Co.	Superior Court of the State of Delaware in and for Kent County	CA No. 09C-07-021 WLW	Depo
July 27, 2010	08-129-FP	Lane, Joseph	Edward Vaughn vs. Ford Motor Co.	Circuit Court of Mobile County, Alabama	CV 2008-901078	Depo
July 15, 2010	10-128-KD	Albright, Chris	McCrae vs. Truck Equipment Sales, Inc.	Circuit Court of Houston County, Alabama	CV-2007-532	Depo
June 4, 7, 8, 2010	07-174-FP	Crosby, Ronnie	Miranda Courtney vs. Nissan Motor Co.	State of South Carolina County of Florence in the Court of Common Pleas	07-CP-21-1449	Trial
May 14, 17, 18, 2010	03-202-FP	Lyons, Stephen	Bagg et al vs. Ford Motor Company et al	Commonwealth of Massachusetts, Superior Court Department of the Trial Court	05-2344-F	Trial
May 6, 2010	04-249-FP	Stanley, Kevin	Clevenger vs. Westfall-O'Dell Motors	Circuit Court of Clay County, Missouri at Liberty	CV104-010886CC	Trial

**Expert Testimony  
of  
Jerry G. Wallingford**

Date	Project Number	Client	Case Style	Case Venue	Cause Number	Type
January 21, 2010	09-148-RP	Younger, John	Affieri vs. U.S.A.	United States District Court for the Western District of Texas, San Antonio Division	SA-08-CA-0277XR	Trial

1/29/2015